

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
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VIA ECF AND FEDERAL EXPRESS

February 16, 2017

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

The Plaintiffs' Executive Committees and Defendants Kingdom of Saudi Arabia and Saudi High Commission for Relief of Bosnia & Herzegovina ("SHC"), jointly write to propose dates and deadlines for further proceedings as to the Kingdom and SHC, following the Second Circuit's February 7, 2017 Order remanding the cases before it for further proceedings in light of the enactment of the Justice Against Sponsors of Terrorism Act ("JASTA").

Initially, the representatives of the Plaintiffs' Executive Committees and counsel for the Kingdom and SHC have conferred and would be available for a conference on March 17 or on any day between March 20-24. The parties anticipate having further discussions relating to the coordination of the multi-district litigation proceedings as to the Kingdom and SHC in the coming weeks, and will advise the Court if, on the basis of those discussions, they believe a conference is necessary. However, the parties do believe reserving a date at this time is advisable.

Following the issuance of the Second Circuit remand Order, counsel for the Kingdom and representatives for the Plaintiffs' Executive Committees also conferred regarding an appropriate schedule for briefing and related proceedings in the remanded actions. On the basis of those discussions, the parties jointly write to request the Court's endorsement of the following deadlines:

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1. March 1, 2017: deadline for service of plaintiffs' proposed amended complaint upon the Kingdom and SHC;
2. June 1, 2017: deadline for any motions to dismiss on behalf of the Kingdom and SHC.

The Kingdom and SHC have reserved their right to oppose plaintiffs' proposed amendment. In the event that they elect to do so, the parties propose that they should confer concerning a schedule for motions practice on that opposition and submit a proposal for the Court's endorsement. The parties further propose that they confer regarding an appropriate deadline for plaintiffs' response to any motion to dismiss or opposition to their amendment on behalf of the Kingdom and SHC after any such motions have been filed.

Finally, counsel for the Kingdom and SHC request that the Court issue an Order confirming that, to the extent they are subject to any deadlines to respond to any newly filed complaints, those deadlines also are extended in accordance with the schedule set forth above. The Plaintiffs' Executive Committees consent to this request.

The parties thank the Court for its consideration of these matters.

Respectfully submitted,

COZEN O'CONNOR



By: Sean P. Carter

SPC/:bdw

cc: The Honorable George B. Daniels (via ECF and Federal Express)
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